

COHEN & GREEN

December 21, 2023

Hon. Lewis A. Kaplan
United States District Court, Southern District of New York
Daniel Patrick Moynihan Courthouse, 500 Pearl Street
New York, New York 10007

By Electronic Filing.

Re: Case No. 22-cv-01445, Rodney v City of New York, et al.

Dear Judge Kaplan:

My firm, with co-counsel, represents Plaintiff in the case named above. Pursuant to the Court's practices, I write to request an extension of two weeks to file objections to Judge Wang's Report and Recommendation on Defendants' Motion to Dismiss (ECF No. 148), from December 29, 2023, to January 12, 2023. Defendants take no position on this request, and have declined to sign any stipulation.¹

Plaintiff requests the extra time both (1) because of the holidays and travel and (2) in order to fully brief and respond to the Report and Recommendation, which addresses complex, interacting claims. If the Court would like more detail on the need for more time, I am happy to supply it.

As always, I thank the Court for its time and consideration.

Respectfully submitted,

/s/

J. Remy Green

Honorific/ Pronouns: Mx., they/ their/ them

COHEN & GREEN P.L.L.C.

Attorneys for Plaintiff

1639 Centre St., Suite 216

Ridgewood, New York 11385

cc:

All relevant parties by electronic filing.

¹ I asked for Defendants' position on Monday. As has been too common in this case, Defendants' counsel failed to respond at all until I followed up today. I should also note that Plaintiff has consented to countless extensions for Defendants, including nearly a year on the basic time to serve their full discovery responses and a recent multiple week extension after Defendants failed to respond at all to a set of discovery requests, just to name a few.